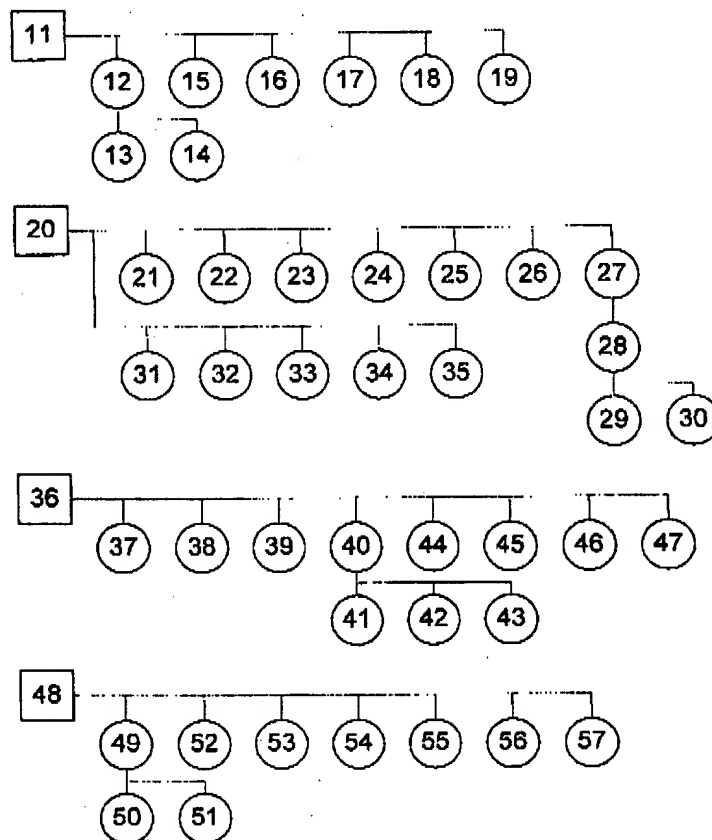


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REMARKS

Reconsideration of the application is respectfully requested. An Office action dated February 13, 2003 is pending in the application. Applicants have carefully considered the Office action and the references of record. In the Office action, claims 1-24, 26-37 and 39-47 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Piskiel et al. in view of Cohen, and claims 25 and 38 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Piskiel et al. in view of Cohen, and further in view of Moore et al. In this response to the Office action, claims 1-10 have been cancelled, claims 11, 12, 14-17, 20, 27, 28, 30-32, 36, 40, 41 and 43-45 have been amended and claims 48-57 have been added. Therefore, claims 11-57 are pending in the application. The following diagram depicts the relationship between the independent and dependent claims.



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Examiner Interview

Applicants would like to thank Examiners Cao and Lao for the courtesy of a telephone interview on May 9, 2003 to discuss the Office action mailed February 13, 2003. Applicants were represented by Messrs. Dodson and Conklin. During the interview, claims 1 and 6-8 were discussed as well as their relevance to U.S. Patent No. 5,893,911 to Piskiel et al. ("Piskiel et al.") and U.S. Patent No. 5,881,315 to Cohen ("Cohen"). As noted in the Interview Summary (paper number 9), the examiner introduced the 1992 Gehani, Jagadish and Shmueli reference *Event Specification in an Active Object-Oriented Database* ("Gehani et al.") with regard to enabled and disabled states. No agreement was reached with regard to particular amendments to claims.

Claim Rejections Under 35 U.S.C. § 103

An issue in the rejections under 35 U.S.C. § 103 is the nature of a trigger structure as set forth and claimed by the present application. With reference to Figure 4 of the specification, trigger 400 has "one or more rules, such as the rule 402," (page 12 of the specification at lines 18-19) and "rule 402 has two parts: a condition 406, and an action 408." (page 12 of the specification at line 20). That each trigger has one or more rules and that each rule has a condition and an action is also claimed explicitly, for example, in claim 11.

Each trigger comprises at least one rule and each rule comprises a condition and an action.

(claim 11, as amended, emphasis added).

Piskiel et al. does not teach such a trigger. Cohen is cited by the Office action as teaching a trigger, but in fact, Cohen teaches an event filter group. An event filter group is described by Cohen as a collection of one or more event filters.

An event filter group is a collection of one or more "event filters."

(Cohen, col. 6, lines 59-60). Even if an event filter is called a condition for purposes of applying the teachings of the Cohen reference to the claims, an event filter is not the same as a rule, which requires a condition and an action. Because an event filter is not a rule, it follows that an event filter group is not a trigger when Cohen is applied to the claims. That

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is, Cohen also does not teach a trigger in accordance with the claimed invention. Thus, neither Piskiel et al. nor Cohen, separately or in combination, teaches or suggests all of the limitations of the independent claims 11, 20, 36 or 48. MPEP § 2143.03 requires that the prior art teach or suggest all of the limitations of a claim.

All the claim limitations must be taught or suggested by the prior art.

(MPEP § 2143.03, emphasis added).

Furthermore, this grouping of rules in triggers, missing from Piskiel et al. and Cohen, is cited by the specification as an example of an advantage overlooked by prior art.

Embodiments of the invention provide for advantages not found within the prior art. For example, rather than forcing development or redevelopment of applications that process messages to invoke modules, embodiments of the invention allow for the writing of rules, and the grouping of the rules in triggers, such that no coding is required.

(page 2 of the specification at lines 18-21, emphasis added).

For at least these reasons, independent claims 11, 20, 36 and 48 are patentable over Piskiel et al. in view of Cohen.

Newly Added Claims

Claims 48-57 added in this amendment more particularly point out and distinctly claim the invention as described by the specification. In compliance with 37 C.F.R. § 1.121(f), they do not add new matter.

Remaining Claims

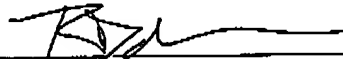
Each of claims 11, 20, 36 and 48 is in independent form, whereas all of the remaining claims depend directly or indirectly on one of these four independent claims. The dependent claims are allowable for at least the same reasons that the four independent claims 11, 20, 36 and 48 are allowable in that the dependent claims incorporate the features of the independent claims. Nevertheless, the dependent claims further define subject matter not shown or rendered obvious by the prior art of record.

CONCLUSION

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The application is considered in good and proper form for allowance, and the examiner is respectfully requested to pass this application to issue. If, in the opinion of the examiner, a telephone conference would expedite the prosecution of the subject application, the examiner is invited to call the undersigned attorney.

Respectfully submitted,



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